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April 6, 1999

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
APR 06 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 96-98 and Cc Docket No. 98-121

Dear Ms. Salas:

On April 5, 1999, Sid Boren, Bob Blau, Randy New, Jim Brinkley, and Bill Stacy, representing BellSouth, met with Larry Strickling, Chief of the Common Carrier Bureau, and members of his staff. Bureau staff members attending the meeting included Carol Matthey, Michael Pryor, Jordan Goldstein and Jake Jennings. The meeting focused upon a BellSouth proposal related to the provision of expanded extended loops. The BellSouth representatives used the attached document to make their presentation.

In accordance with Section 1.1206. I am filing two copies of this notice in both of the proceedings identified above. Please place the notice in the records of both.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice President – Federal Regulatory

Attachment

cc: Larry Strickling (w/o attachment)
Carol Matthey (w/o attachment)
Michael Pryor (w/o attachment)
Jordan Goldstein (w/o attachment)
Jake Jennings (w/o attachment)

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LOOP TRANSPORT PROPOSAL

BELLSOUTH

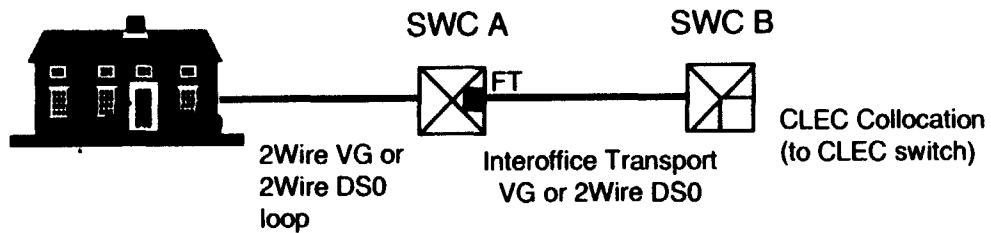
April 5, 1999

BELLSOUTH PROPOSAL

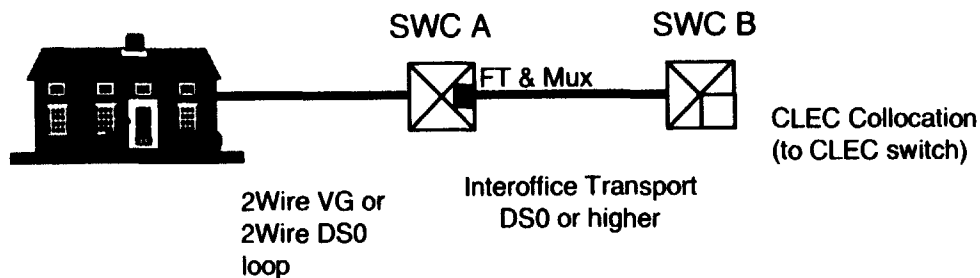
- **BELLSOUTH, while not currently required, would offer on a voluntary basis and concurrent with 271 approval the following expanded extended loops (EELs)**
- **An EEL would have the following characteristics:**
 - EELs must be connected to a CLEC's circuit switch that handles primarily voice local exchange traffic; the CLEC's switch must provide dialtone
 - EELs will terminate at the end user's premise at no higher than voice grade or DS0 level
 - The CLEC can elect to use DS1 or higher service for interoffice transport
 - EELs will be offered in serving wire centers which have less than 2 collocators
 - The price to the CLEC will be the sum of the approved UNE elements utilized in the provision of service
 - For EELs which include a serving wire center with 2 or more collocators, the price for the EEL would be negotiated

LOOP/TRANSPORT -- OVERVIEW

● Low Cap* Loop / Transport (*DS0 & Voice Grade)



● Low Cap* Loop / High Cap** Transport (**DS1 and higher)



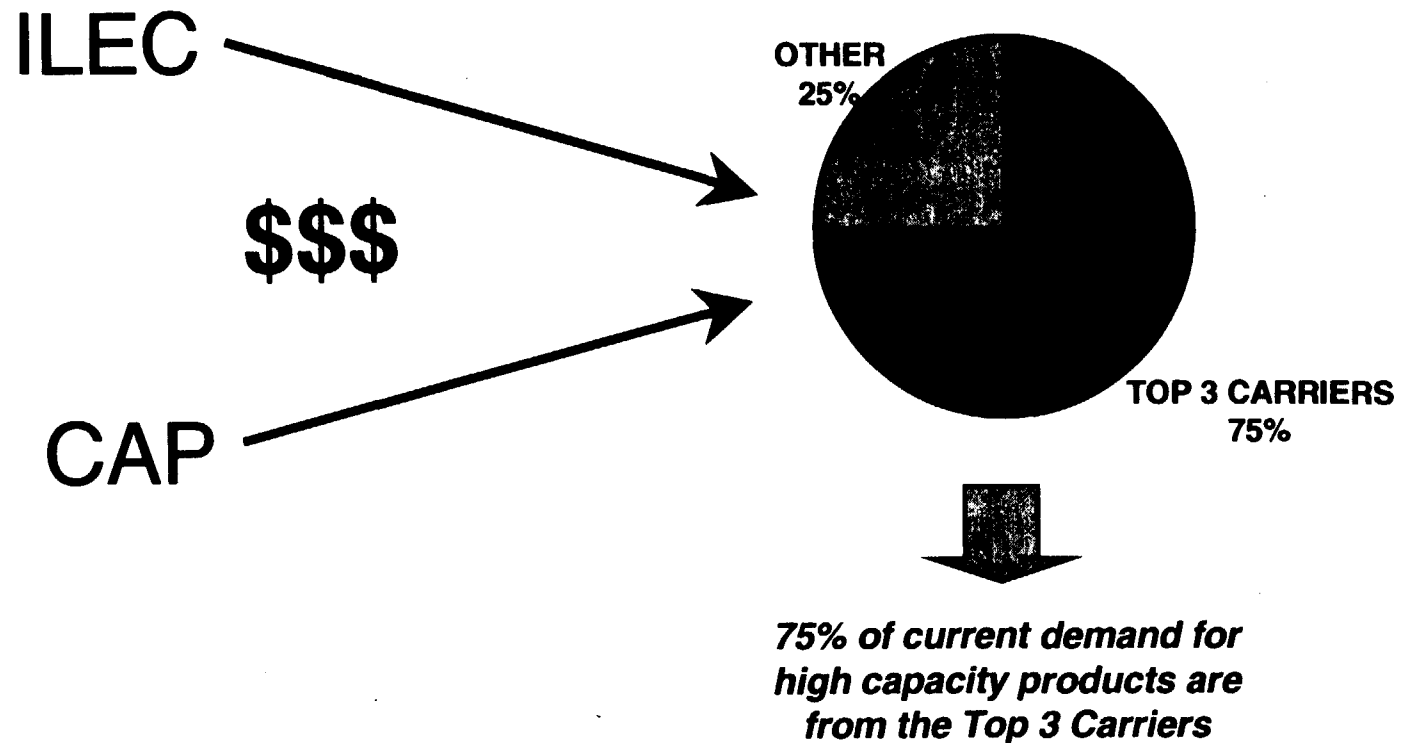
- CLEC can provide basic local voice services -- 1FR, 1FB, VG PBX Trunks, Point to Point VG/DS0 Private Line, etc.
- CLEC will not have to co-locate or invest capital in SWC A (or any intermediate SWC)

Legend:

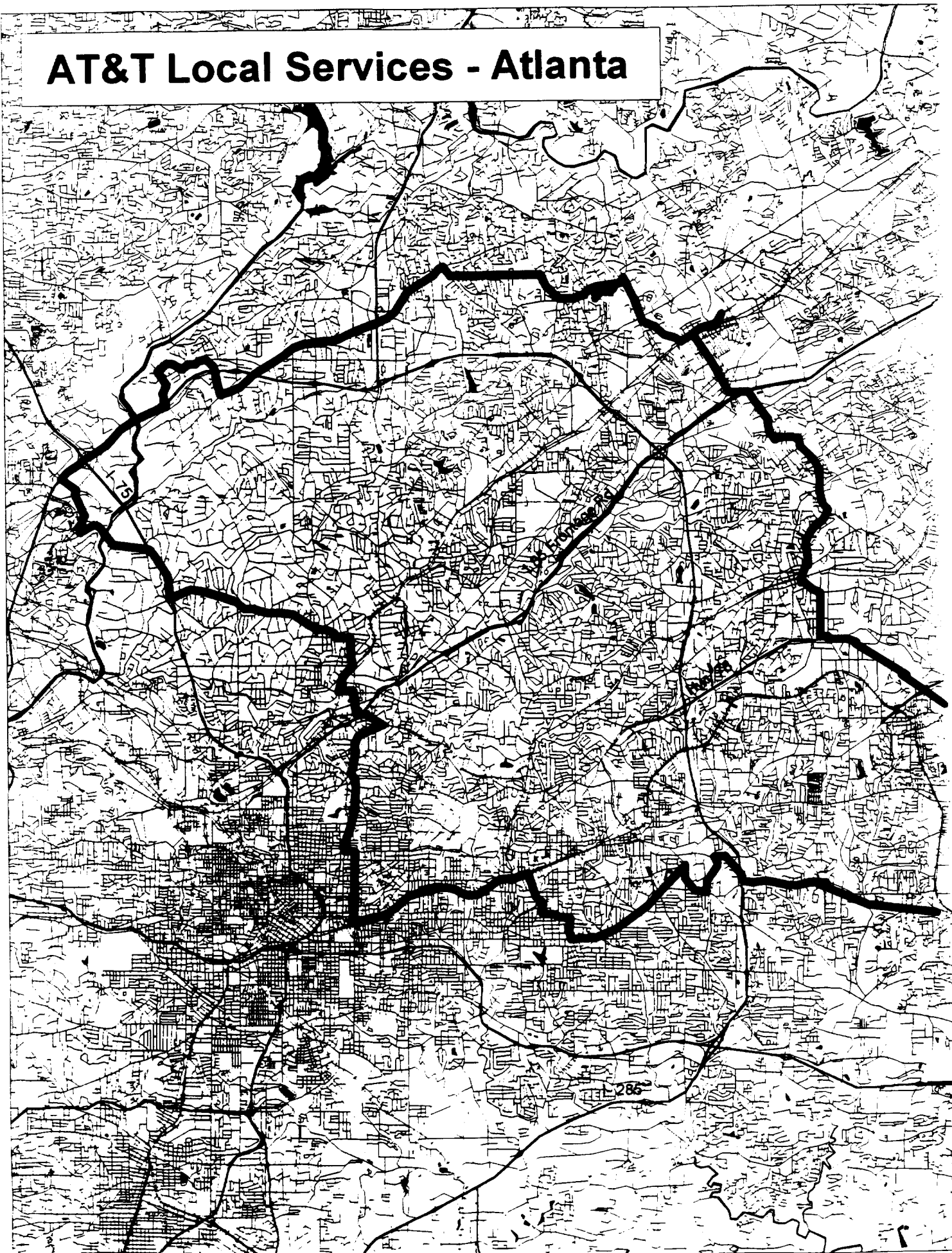
VG -	Voice Grade
DS0 -	56 or 64 kb digital circuit
Mux -	Multiplexer
FT -	Facility Termination
SWC -	Serving Wire Center

LOOP/TRANSPORT -- POTENTIAL SHIFT OF WEALTH

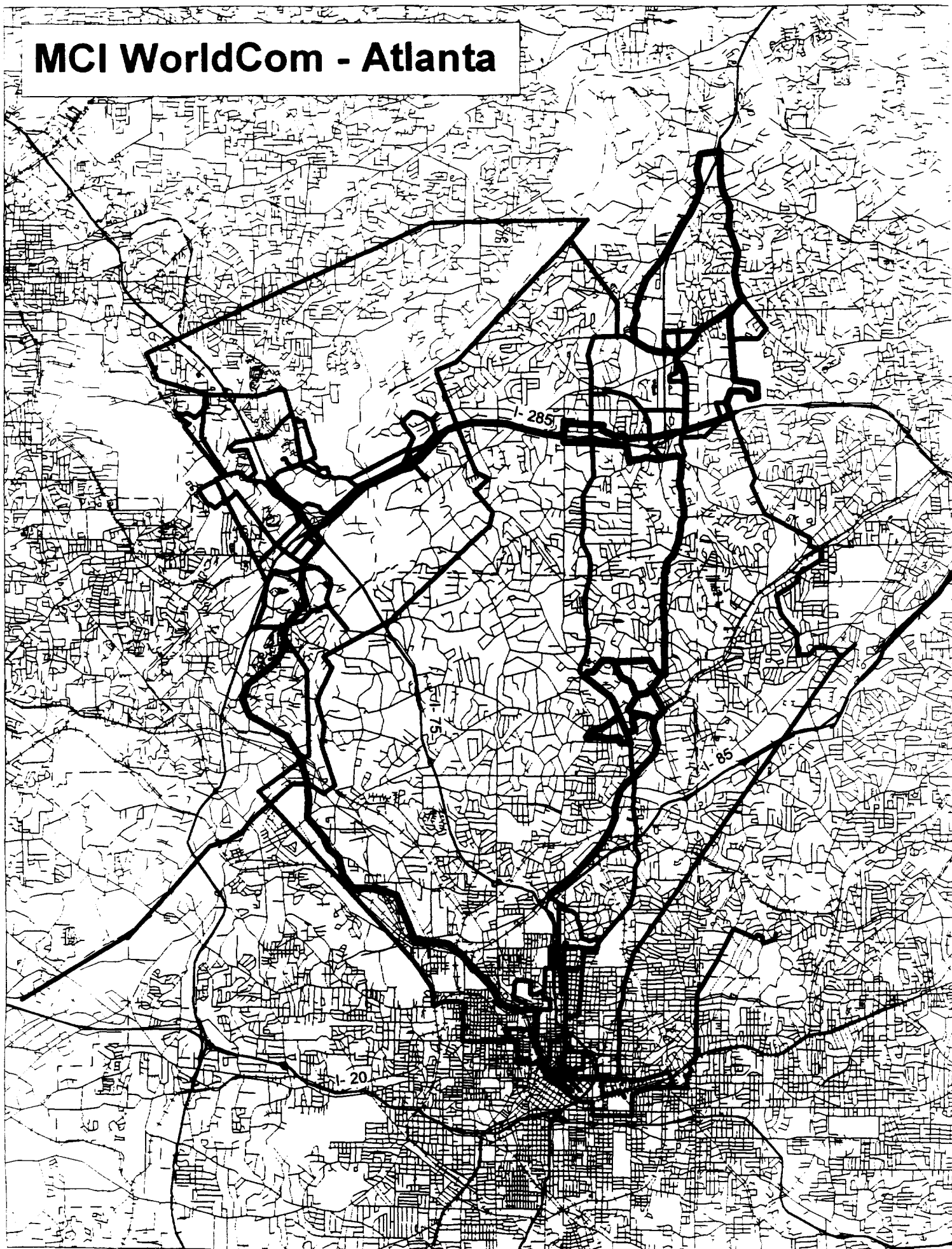
**... And Transfer This Value to Large IXC's
without benefit to the consumer**



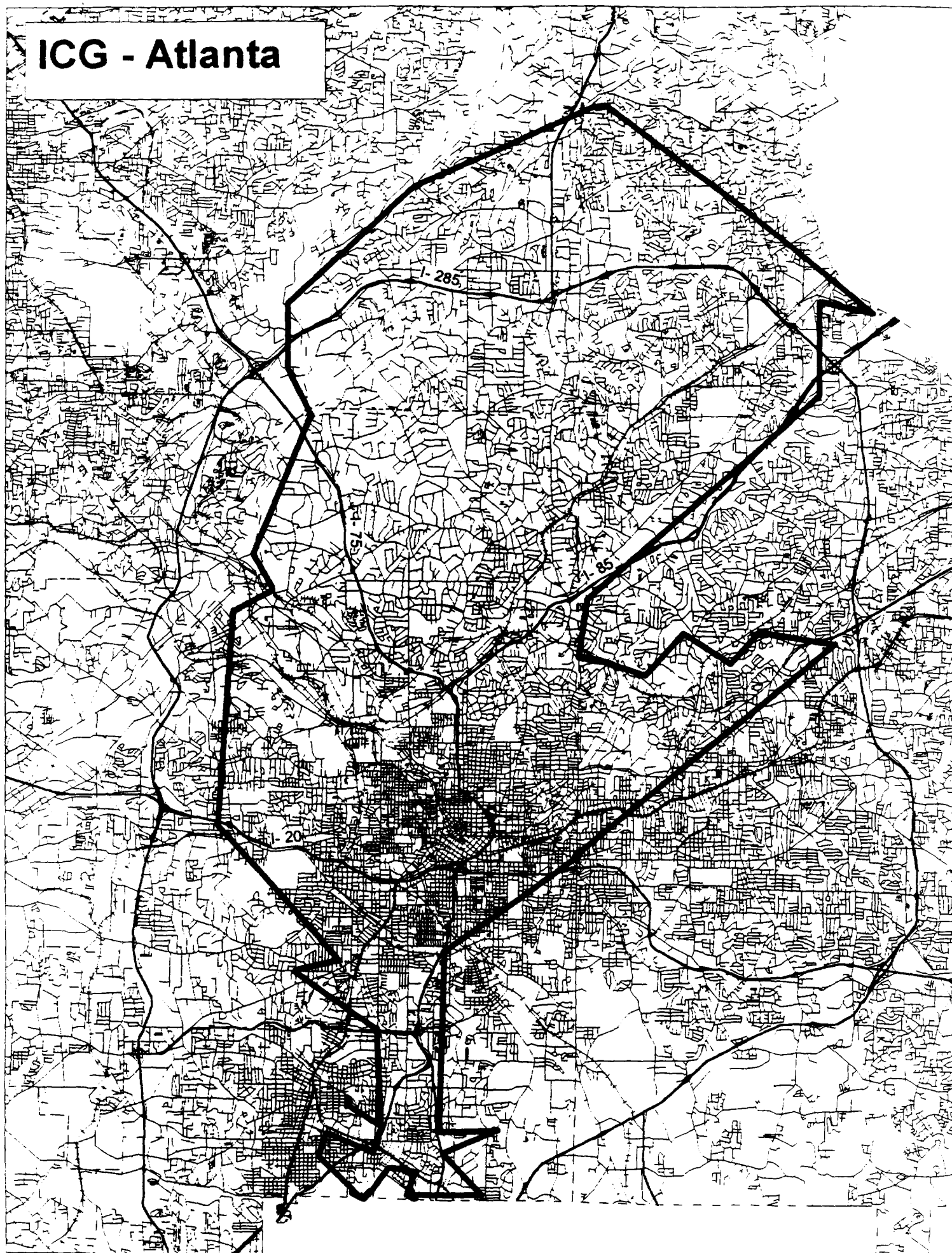
AT&T Local Services - Atlanta



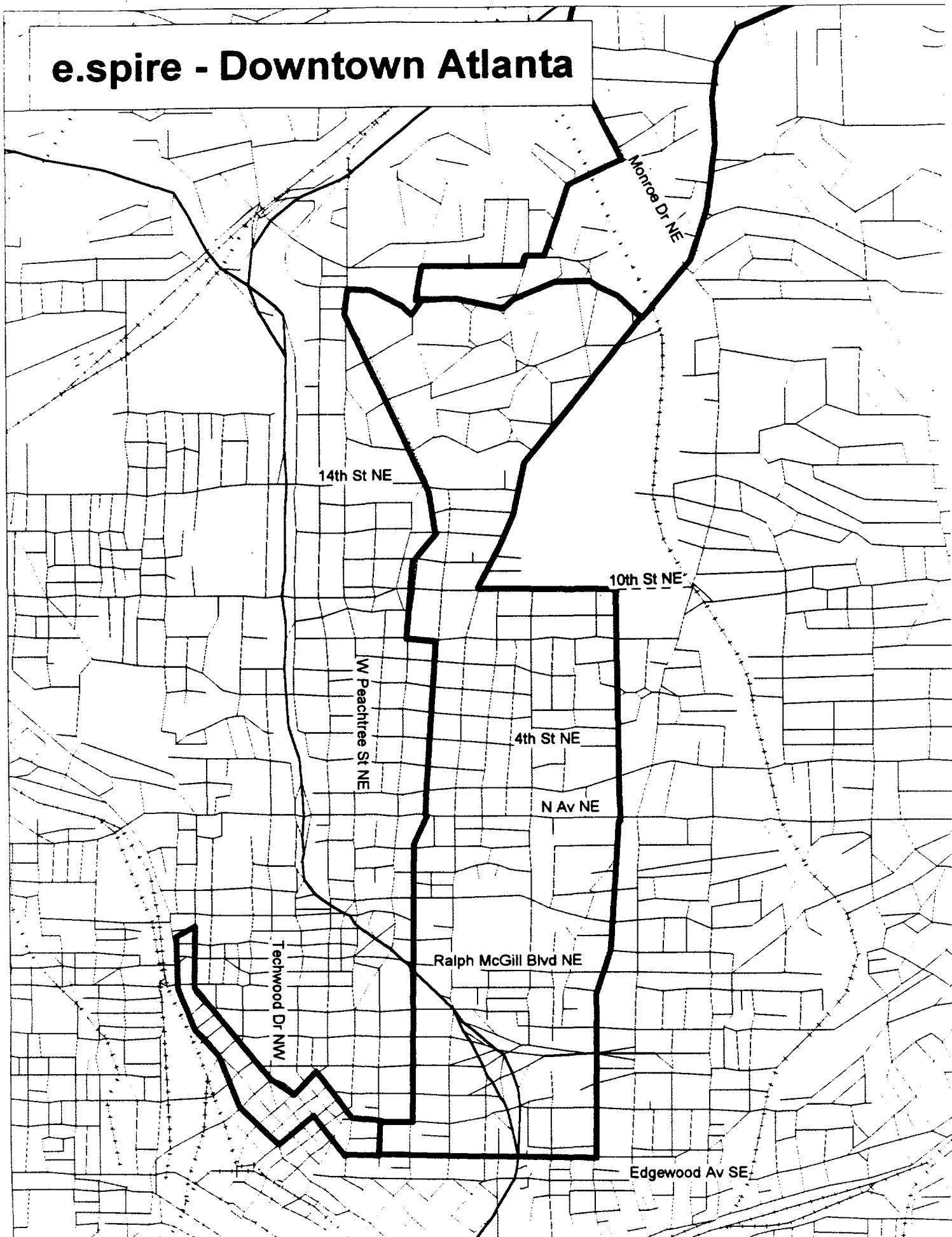
MCI WorldCom - Atlanta



ICG - Atlanta



e.spire - Downtown Atlanta



LOOP / TRANSPORT ALTERNATIVES -- MAJOR METROS

Metro	% of wire centers with 2 or more co- locators	% of lines available to competitors - wire centers with 2 or more co-locators	% of revenues available to competitors - wire centers with 2 or more co-locators	% of revenues available to competitors
Atlanta	79	91	93	93
Birmingham	25	36	46	64
Charlotte	77	94	94	97
Jacksonville	56	68	74	85
Louisville	31	44	50	63
Memphis	57	84	87	87
Miami	57	71	73	99
Nashville	60	86	89	89
New Orleans	13	23	32	41

* includes virtual collocation